



**AMERICA'S NUCLEAR SOLUTION**

WCS-CISF-16-002

November 16, 2016

Mr. Mark Lombard, Director  
U.S. Nuclear Regulatory Commission  
Division of Spent Fuel Management  
Attention: Document Control Desk  
One White Flint North  
11555 Rockville Pike  
Rockville, MD 20852-2738

- References: (1) Letter from J. Scott Kirk (WCS) to Mark Lombard (NRC), License Application to Construct and Operate a Consolidated Interim Storage Facility for Spent Nuclear Fuel in Andrews County, Texas, Docket 72-1050, dated April 28, 2016
- (2) Letter from Mark Lombard (NRC) to Scott Kirk (WCS), Acceptance Review of Specific License Application Requesting Authorization to Construct and Operate a Consolidated Interim Storage Facility for Spent Nuclear Fuel – Supplemental Information Needed, dated June 22, 2016
- (3) Letter from Michael Ford (WCS) to Mark Lombard (NRC), Supplemental Information to Support the License Application for an Interim Storage Facility for Spent Nuclear Fuel in Andrews County, Texas, Docket 72-1050, dated October 7, 2016

**Subject: Supplemental Information to Support a License Application for a Consolidated Interim Storage Facility for Spent Nuclear Fuel in Andrews County, Texas, Docket 72-1050**

Dear Mr. Lombard:

Waste Control Specialists LLC (WCS) hereby files supplemental information requested by the NRC letter dated June 22, 2016 (Reference 2) to support continued NRC review of the April 28, 2016 WCS License application requesting authorization to construct and operate a Consolidated Interim Storage Facility for Spent Nuclear Fuel in Andrews County, Texas (Reference 1). WCS is

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~~Enclosures transmitted herein contain~~ **SUNSI**. When separated from enclosures, this transmittal document is decontrolled.

This submittal contains PDF files, one or more of which contains hyperlinks to other files or to the Internet. These hyperlinks are either inoperable or are not essential to the use of the filing. Any material referenced by hyperlinks to the Internet that was essential for use of this filing has been submitted as part of the filing. Any material referenced by a hyperlink to another PDF that was essential for the use of this filing has either been included by reference or submitted as part of this filing.

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providing responses to Request for Supplemental Information (RSI) items in accordance with the RSI Response Schedule enclosed in our letter to you dated October 7, 2016 (Reference 3, Enclosure 1).

The schedule has been updated to show our plans for future submittals, including indication of certain RSI responses which will be revised and resubmitted. The schedule also shows five items that had been planned for this submittal but are now planned for our December submittal based on (a) being related to other December items, (b) predicated on the discussions and feedback that will occur during the November 22, 2016 meeting, or (c) a need to continue to develop the responses and application changes.

Finally, when adding the public meeting and the attendant preparatory and follow-on activities to the project plan, we found that the impact to our current schedule for the December 9, 2016 submittal is approximately one week. Therefore, we are requesting your approval to provide the December submittal on the Friday, December 16<sup>th</sup>, instead of the 9<sup>th</sup>. The schedule is included herein as Enclosure 1.

This submittal contains the following enclosures:

- Enclosure 1 provides an updated WCS RSI response schedule.
- Enclosure 2 provides affidavits, in accordance with 10 CFR 2.390, specifically requesting that the proprietary information included in Enclosures 3, 5, 7, 10, 11, and 12 of this submittal be withheld from public disclosure. That information may not be used for any purpose other than to support the review of the WCS application. A non-proprietary version of Enclosure 3 is provided in Enclosure 6. A non-proprietary version of Enclosure 5 is provided in Enclosure 13. Since Enclosures 7, 10, 11, and 12 are entirely proprietary, no corresponding non-proprietary versions are provided.
- Enclosure 3 provides responses to the RSI items. This enclosure is partially proprietary.
- Enclosure 4 provides a list of changed WCS application and SAR parts and indication of the associated RSI(s).
- Enclosure 5 provides changed pages for affected parts of the application and the SAR. This enclosure is partially proprietary.
- Enclosure 6 provides a public version of the Enclosure 3 RSI responses.
- Enclosure 7 provides portions of a procedure associated with proprietary RSI P-9-1. Enclosure 7 is entirely proprietary.
- Enclosure 8 provides a list of non-copyright references associated with Multi-discipline RSI NP-1.1.
- Enclosure 9 provides pdfs of non-copyright references associated with Multi-discipline RSI NP-1.1 which are not proprietary.
- Enclosure 10 provides pdfs of non-copyright references associated with Multi-discipline RSI NP-1.1 which are proprietary. Enclosure 10 is entirely proprietary.
- Enclosure 11 provides Calculation AREVATN001-CALC-001, Revision 1, associated with RSI NP-5.7. Enclosure 11 is entirely proprietary.
- Enclosure 12 provides Calculation AREVATN001-CALC-002, Revision 0, associated with RSI NP-5.7. Enclosure 12 is entirely proprietary.

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- Enclosure 13 provides a public version of the Enclosure 5 changed application and SAR pages.

Application, SAR, and procedure changes are tracked and indicated by revision bars and italics for newly inserted text. All changes from previous RSI response submittals are tracked. The new changes, associated with the RSI responses herein, are further annotated with rectangles enclosing the changed areas and RSI numbering indications as to which RSI is related to the changes.

All application and SAR pages are shown as "Interim Rev. 1." WCS will prepare a consolidated updated revision to the application, the SAR, the Environmental Report, etc. containing all of these pages, to be provided after the final RSI response submittal.

This submittal is being provided as an electronic submission, using the optical storage media (OSM) provision from Section 4 of the NRC Guidance for Electronic Submissions to the NRC. Accordingly, we have included a Document Components listing and OSM#1 and OSM#2 listings at the end of this cover letter.

WCS requests that a copy of all correspondence regarding this matter be emailed to my attention ([mford@valhi.net](mailto:mford@valhi.net)) as soon as possible after issuance. If you have any questions or need additional information, please call me at your earliest convenience at 972-450-4284.

I certify under penalty of perjury that the foregoing is true and correct.

Executed on November 16, 2016



Michael Ford, CHP  
Vice President, Licensing & Corporate Compliance

Cc:

John-Chau Nguyen, NRC (one hardcopy of this cover letter; five copies of the OSM#1 disk and one copy of the OSM#2 disk)

Cover letter only:

Elicia Sanchez, WCS  
Jay Britten, WCS  
Jay Cartwright, WCS  
Jeremy Vesely, WCS

One copy of the OSM#1 disk, which contains the entire submittal, to the following:

Ray Phan, AREVA  
Kent Cole, NAC International  
WCS Regulatory Compliance  
WCS Records Management

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Enclosures:

1. Waste Control Specialists LLC RSI Response Schedule
2. Affidavits Pursuant to 10 CFR 2.390
  - Waste Control Specialists LLC Affidavit dated 11 NOV 2016
  - TN Americas LLC E-46860 Affidavit Pursuant to 10 CFR 2.390
  - NAC International Affidavit Pursuant to 10 CFR 2.390 dated November 11, 2016
3. RSIs and Responses (proprietary version)
4. List of Changed WCS CISF Application and SAR Parts and Associated RSIs
5. Changed WCS CISF Application and SAR Pages, Interim Revision 1 (proprietary)
6. RSIs and Responses (public version)
7. Portions of Procedure QP-10.02, Associated with Proprietary RSI P-9.1 (proprietary)
8. List of References in Support of Response to RSI MD NP-1.1
9. Non-Proprietary References Associated with RSI MD NP-1.1
10. Proprietary References Associated with RSI MD NP-1.1 (proprietary)
11. Calculation AREVATN001-CALC-001, "ISFSI Pad Design for WCS at Andrews, Texas," Revision 1, associated with RSI NP-5.7 (proprietary)
12. Calculation AREVATN001-CALC-002, "Soil Structure Interaction Analysis of TN Independent Spent Fuel Storage Installation (ISFSI) Concrete Pad at Andrews, TX," Revision 0, associated with RSI NP-5.7 (proprietary)
13. Public Version of Changed WCS CISF Application and SAR Pages, Interim Revision 1

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**Document Components:**

- 001 Public WCS Transmittal Letter.pdf, 870,583 bytes
- 002 Public Enc 1 WCS RSI Schedule.pdf, 85,487 bytes
- 003 Public Enc 2 Affidavits.pdf, 2,722,910 bytes
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